

# **EXHIBIT D**

## Summary of Allegations in Complaints Against Prince Salman and the SHC

References in chart are to paragraph numbers in complaints.\*

Allegation	Ashton	Burnett (NY)	Burnett	Federal Insurance	Barrera	Salvo
Prince Salman founded the Saudi High Commission in 1992 (or 1993) and is a supporter of the charity.	446	392	392	454	448	290
Prince Salman has a history of funding Islamic extremism having been Chairman of the General Donation Committee for Afghanistan (GDFA). In 1981, the GDFA gave \$39m to aid Afghan mujahideen.	289	400	400	-	291	298
In 1999, Prince Salman made a donation of \$400,000 during a fundraising event for Bosnia Herzegovina and Chechnya. The fundraiser was run by IIRO, WAMY and Al-Haramain.	290	401	401	461	292	299
Israeli Defense Forces found evidence that Prince Salman financed radical Palestinian organizations	291	402	402	-	293	300
Prince Salman aided and abetted Al Qaeda and bin Laden and provided material support to them.	255	403	403	455	-	247
The SHC provided \$560,900,000 in donations to Bosnia in a nine year period, and since 2000, some funds have been diverted for other purposes. Prince Salman was alerted to this diversion by letter in September 2000.	454	404	404	-	456	301
A group known as Mothers of Srebrenica stated that although Prince Salman announced \$200 million had been collected in one day as part of a fundraiser, the funds did not reach the Srebrenica people.	454-455	404-05	404-05	185, 457	456-57	301-02
Prince Salman failed to take appropriate actions regarding SHC management and use of funds.	457	406	406	-	459	303

Allegation	Ashton	Burnett (NY)	Burnett	Federal Insurance	Barrera	Salvo
Prince Salman intended that the SHC would fund and support Islamic militants in Bosnia including Al Qaeda, and he knew that the SHC was supporting Al Qaeda in the following years.	-	-	-	456-457	-	-
In 1999, Prince Salman donated 1 million Saudi riyals during a fundraising drive by the IIRO and Sanabel al-Kheer.	-	-	-	461	-	-
Prince Salman is "instrumental" in raising money for charities that work with Al Qaeda and, in 1994 press conference sponsored by the IIRO and Sanabel al-Kheer, he stated that he had personally raised more than 6 million riyals for these two groups from wealthy donors.	-	-	-	462	-	-
Prince Salman knew that his donations to these groups would be used to fund Al Qaeda's acts of terrorism.	-	-	-	463	-	-
The SHC has been criticized for importing the more extreme form of Islam, Wahhabism, into Bosnia.	447	393	393	-	449	291
On October 21, 2001, five Algerians were arrested in Bosnia Herzegovina. One was a top Al Qaeda lieutenant and one, Sabir Lamar, worked for the SHC.	448-450	394-396	394-96	-	450, 452	292, 294
In October 2001, U.S. forces raided the Sarajevo branch of SHC and found computer hard drives and photographs of the World Trade Center as well as photos of U.S. embassies, files on pesticides, information on how to make fake State Department badges, \$100,000 worth of currency, and anti-Semitic and anti-U.S. literature.	451	397	397	186, 458	453	295
Analysis of the seized materials describe the SHC as a front for radical and terrorism activities which used vehicles with diplomatic plates to transport members and materials inside Bosnia Herzegovina.	452-53	398-99	398-99	187, 459	454-55	295-97
SHC records do not account for \$41 million and the U.S. government is currently investigating the SHC's use of funds.	456	407	407	184, 460	458	304

Allegation	Ashton	Burnett (NY)	Burnett	Federal Insurance	Barrera	Salvo
The High Court of Sarajevo has required the SHC to submit banking and account records, an inventory of assets and liabilities and accounting of all business transactions.	-	408	408	-	-	-
The SHC is "an agency, instrumentality and organ of the Kingdom of Saudi Arabia." The Kingdom controls the SHC, appoints its personnel and provides most of its funding.	-	-	-	181	-	-
The SHC is part of Al Qaeda's logistical and financial support infrastructure, and has provided material support to Al Qaeda.	-	-	-	182, 188	-	-
In 1992, Al Qaeda fighters "disguised as relief workers for the Saudi High Commission" entered Bosnia-Herzegovina.	-	-	-	183	-	-
From 1992 to 2002, the SHC funneled millions of dollars to Al Qaeda operations in Bosnia.	-	-	-	184	-	-
The September 11th attacks were a direct and foreseeable result of the SHC's support of Al Qaeda.	-	-	-	189	-	-

\* **NOTE:** These charts are based on the following versions of the complaints: Ashton ("Third Amended Master Consolidated Complaint," filed Sept. 5, 2003); Burnett (NY) ("Amended Complaint," filed Sept. 5, 2003); Burnett (DC) ("Third Amended Complaint"); Federal Insurance ("First Amended Complaint," filed March 10, 2004); Salvo ("Consolidated First Amended Master Complaint"); Barrera ("Complaint"). On March 10, 2004, the plaintiffs in Ashton filed a "Fourth Amended Consolidated Master Complaint." The actual amendment, however, consisted only of an amended caption; all substantive allegations related to the Ashton plaintiffs' claims are contained only in the Third Amended Consolidated Master Complaint.